



DEPARTMENT OF HEALTH AND HUMAN SERVICES

Public Health Service

Food and Drug Administration
College Park, MD 20740

APR 21 2004

2015 10 APR 26 9 29

Kevin Asip
123 Southridge Drive
Rochester, New York 14626

Dear Mr. Asip:

This is in response to your letter dated March 17, 2004, to the Food and Drug Administration (FDA) regarding the use of terms such as "low carbohydrate" in the labeling of food products. You expressed concern that consumers may be misled by products bearing carbohydrate claims and commended FDA's decision to define terms such as "low carbohydrate" and "reduced carbohydrate." You asked whether FDA intends to compromise with the Grocery Manufacturers of America and the Center for Science in the Public Interest on their suggested definitions of "low carbohydrate" and requested information on how FDA would define this term.

FDA has received petitions from Kraft Foods North America, Inc. (Docket No. 2004P-0105/CP1), ConAgra Foods, Inc. (Docket No. 2004P-0107/CP1), and the Grocery Manufacturers of America (Docket No. 2004P-0110/CP1) requesting definitions for terms used to describe the carbohydrate content of foods. These petitions were submitted pursuant to section 403(r)(4) of the Federal Food, Drug, and Cosmetic Act (the act) and Title 21 of the Code of Federal Regulations section 101.69. In accordance with section 403(r)(4)(A)(i) of the act and section 101.69(m)(3), FDA filed these petitions on March 11, 2004.

FDA is currently reviewing these petitions and the issues surrounding the use of nutrient content claims to characterize the carbohydrate content of foods. We will determine an appropriate course of action following the completion of this review.

You may access any of the dockets mentioned above at <http://www.fda.gov/ohrms/dockets/default.htm>. We have forwarded your letter to the Division of Dockets Management for inclusion in Docket Nos. 2004P-0105, 2004P-0107, and 2004P-0110. Please be assured that we will consider all comments to these petitions prior to making a final decision on this issue.

Should you have additional questions, do not hesitate to contact us.

Sincerely yours,

Ritu Nalubola, Ph.D.
Food Labeling
and Standards Staff
Office of Nutritional Products, Labeling
and Dietary Supplements
Center for Food Safety
and Applied Nutrition

2004P-0110

C1/ANS

123 Southridge Drive
Rochester, N.Y 14626
March 17, 2004

13-24-2004 1:53 PM

Honorable Lester Crawford
FDA Deputy Commissioner
U. S. Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857-0001

Dear Mr. Crawford,

My name is Kevin Asip and I am a senior at Spencerport High School in Rochester, New York. I have been assigned to write to a public official for a class called Participation in Government. I am writing with the concern of companies and food manufacturers misleading consumers by labeling products as "low-carbohydrate." I commend the Food and Drug Administration's decision to determine exactly how many carbohydrates are allowed to advertise itself as a "low or reduced-carbohydrate", and determining what should be classified as a carbohydrate. As a result of your decision, dieters and consumers will no longer be misled.

Do you plan to compromise with the Grocery Manufacturer's of America definition of low carbohydrate and the Center for Science in the Public Interest's definition? If so, what would be your choice and why?

Thank you in advance for your time.

Sincerely,



Kevin Asip